

REMARKS/ARGUMENTS

Claim 67 was amended to include the specific implementation of the http header field of original claim 68. Claim 69 was amended to include all the limitations of the base claim 67.

Claim 71 was amended to include the specific implementation of the http header field of original claim 72. Claim 73 was amended to include all the limitations of the base claim 71.

Original claims 68, 70, 72 and 74 were canceled.

Claims 1-66 remain unchanged.

The Examiner rejected independent claims 55 and 66 under 35 U.S.C. 102(e) as being anticipated by Lektion et al. (US Patent Application Publication U.S. 2003/0131051). The Examiner suggested that Lektion teaches a distributed computing system for running an application over a network, wherein said application comprises a client side component and a server side component, said system comprising:

- a client runtime environment (CRE) for running the client side component of the application and maintaining the client side application's state in a client side Document Object Model (DOM);

- a server runtime environment (SRE) for running the server side component of the application and maintaining the server side application's state in a server side DOM; and

- wherein said client side DOM is automatically synchronized with said server side DOM.

After careful examination of the cited patent application by Lektion et al., we find the following differences from claim 55.

Lektion et al. does not teach synchronizing an application but rather synchronizing of data.

Lecture et al. does not teach synchronizing a client side of an application with a server side of an application or data between a client side DOM and a server side DOM over a network, but rather synchronizing data among a cluster of servers 120 for fault tolerance and load balancing purposes (see page 2, §0022) and for “trying to keep the data identical on all the separate server machines in the cluster-even when the data is changing-so that identical requests from clients to any machine will be identical.” (see page 3, §0035). “Each of the servers in the server cluster is a node, referred to as a Cnode. A cluster contains many server machines, and these machines operating in tandem give the view of a single server. This permits servicing of many more clients.” (see page 3, §0035). In other words, each server is or appears to be identical to each other and to a client machine whereas in the present invention the client machine that contains the CRE where the client side component of the application is run is different from the server machine that contains the SRE where the server side of the application is run. Referring to FIG. 4 of the present application, the SRE 214 although architecturally similar to the CRE 224 it is setup to provide and receive interactions with a user through a user interface, whereas the SRE is setup to provide and receive interactions with other machines through an application server interface. The CRE 224 runs inside a client web browser 220 and has a user interface module whereas the SRE runs behind an HTTP web server 219 and has an application server interface. The data in the client side DOM 226 although they get synchronized with the data in the server side DOM they are not necessarily identical. Furthermore, the SRE includes a clustering module that provides support for clustering the SRE.

The servers in the server cluster 120 are hardwired to each other via a system bus 206 (see FIG. 2, processors 202, 204 connecting to system bus 206) and they are not connected to each other via a network. In the present invention the client machine is connected to a server machine via a network that may be any type of network including low bandwidth and low speed networks.

Based on these differences we don't think that the invention of Lecture et.al. applies to the present invention as claimed in claim 55.

Regarding claim 66, the cited patent application by Lektion et al., differs from claim 55 because of the following reasons:

Lektion et al. does not store data in a client side DOM, but only in a server side DOM.

Lektion et al. does not teach synchronizing data between a client side DOM and a server side DOM over a network, but rather synchronizing data among a cluster of servers 120 for fault tolerance and load balancing purposes (see page 2, §0022) and for “trying to keep the data identical on all the separate server machines in the cluster-even when the data is changing-so that identical requests from clients to any machine will be identical.” (see page 3, §0035). “Each of the servers in the server cluster is a node, referred to as a Cnode” (see page 3, §0035). Each node is essentially identical to each other and provides the same functionalities and data, whereas in the present invention the client machine does not provide the same functionalities and data as the server machine, as was mentioned above.

Furthermore, the servers in the server cluster 120 are hardwired to each other via a system bus 206 (see FIG. 2, processors 202, 204 connecting to system bus 206) and they are not connected to each other via a network. In the present invention the client machine is connected to a server machine via a network that may be any type of network including low bandwidth and low speed networks.

Accordingly, it is believed that independent claims 55 and 66 are patentably distinguishable from Lektion et.al. Claims 56-65 depend upon claim 55 and claim additional features of the invention. Since claim 55 is distinguishable from Lektion et al. they should also be distinguishable from Lektion et al.

The Examiner rejected independent base claims 67 and 71 under 35 U.S.C. 102(e) as being anticipated by Burak et al. (US Patent Application Publication U.S. 2002/0161853). The Examiner also stated that the specific implementations of http header fields of claims 68, 69, 72 and 73 appear to be allowable over the prior art of record. Accordingly, claims 67 and 71 were amended to include the specific implementations of the http header fields of claims 68 and 72, respectively, and claims 69 and 73 were amended to include all the limitations of the base claims 67 and 71,

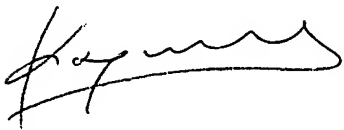
respectively. Accordingly it is believed that amended claims 67, 71, 69 and 73 should now be patentably distinguishable from the Burak et al. patent application. Claims 75-78 depend upon claim 71 and since amended claim 71 is patentable distinguishable from the prior art they should also be patentably distinguishable from the prior art of record.

Claims 1-54 were previously allowed. In view of the above, it is submitted that all claims are in condition for allowance. Reconsideration of the rejections and objections is requested and allowance of all claims at an early date is solicited.

Four depended claims of the 78 originally submitted claims have been cancelled and two depended claims were rewritten as independent. A check for \$50.00 dollars is enclosed as the additional independent claims fee.

If this response is found to be incomplete, or if a telephone conference would otherwise be helpful, please call the undersigned at 617-558-5389

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Alik Collins', with a stylized flourish at the end.

Alik K. Collins, Ph.D.

Reg. No. 43,558

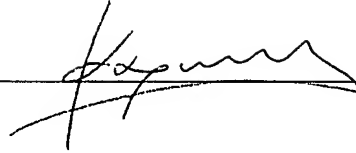
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Date of Deposit 10/22/2004

Name: Aliko K. Collins, Ph.D. Signature

A handwritten signature in black ink, appearing to read 'Aliko K. Collins', written over a horizontal line.

I hereby certify under 37 CFR 1.10 that this correspondence is being faxed on the date indicated above and is addressed to the Commissioner for Patents, P. O. Box 1450, Alexandria, VA 22313-1450